

Michael P. Kelly
Managing Partner
mkelly@mccarter.com



ATTORNEYS AT LAW

June 24, 2005

The Honorable Sue L. Robinson
U. S. District Court
for the District of Delaware
844 North King Street, Room 4209
Lock Box 18
Wilmington, DE 19801

**Re: Pamela Graebar v. Mother's Work
C.A. No. 04-CV-1374 SLR**

Dear Judge Robinson:

I am writing on behalf of both parties to seek an extension of the dates for the close of discovery (presently scheduled for July 1, 2005) and the filing of dispositive motions (presently scheduled for August 1, 2005). In addition, in light of these extensions, the parties hereby jointly request an adjournment of the October 31, 2005 trial date, until a new date that will permit sufficient time for any dispositive motions to be briefed and decided before trial.

The parties are seeking these extensions because scheduling conflicts prevented them from identifying mutually-agreeable dates prior to the close of discovery for the Plaintiff's deposition and the deposition of several deponents identified by Plaintiff. Unfortunately, the parties will be unable to complete the depositions in this action until late-August due to extensive travel by Defendant's counsel (Mr. Mazurek) over the next 6 weeks and a trial that Defendant's counsel must conduct in mid-August. Therefore, the parties respectfully request that the Court extend the discovery period to September 1, 2005.

In light of this extension of discovery, the parties also respectfully request an extension of the deadline for filing of dispositive motions until September 23, 2005. The parties believe that this new deadline will permit for the potential settlement of this action at the September 9, 2005, mediation before costs are incurred in connection with briefing dispositive motions. Finally, in light of the new deadline for dispositive motions, the parties respectfully request that the Court adjourn the existing trial date so that dispositive motions may be fully briefed and decided before the parties incur costs associated with trial preparation, if necessary.

The Honorable Sue L. Robinson
June 24, 2005
Page 2



I have taken the liberty of enclosing a Stipulation/ Form of Order, in the event Your Honor agrees with this request.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read 'M. Kelly'.

Michael P. Kelly

MPK/mrh

Enclosure

cc: Edward S. Mazurek, Esq.
Noel E. Primos, Esq.
Michael J. Puma, Esq.